

The Honorable James Robart

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

DWIGHT HOLLAND,

Plaintiff,

v.

OFFICER WSP ANTHONY BROCK in
his individual and official capacity as
Washington State Patrol officer,

Defendants.

NO. 12-cv-0791 JLR

DECLARATION OF TOBIN E. DALE
IN SUPPORT OF DEFENDANT
WASHINGTON STATE PATROL
TROOPER ANTHONY BROCK'S
MOTION FOR COSTS AND
ATTORNEY FEES

NOTE ON CLERK'S CALENDAR:
FRIDAY, FEBRUARY 28, 2014

TOBIN E. DALE hereby declares:

1. I am the Assistant Attorney General responsible for defending Washington State Trooper Anthony Brock (defendant or "Trooper Brock") in this matter. I am over the age of eighteen years, not a party to the above-captioned action, and am competent to testify to the matters set forth in this Declaration. This Declaration is based upon my personal knowledge in my capacity as counsel for the defendant.
2. Defendant is entitled to statutory attorney's fees in the amount of \$20.00, pursuant to 28 U.S.C. § 1923.
3. Defendant incurred \$2,073.15 for the costs of obtaining depositions in this case of the plaintiff and his only witness, his fiancée Yolanda King. The deposition charges were necessarily incurred in this case. The depositions were available at trial for impeachment, and the deposition charges represent the charges incurred by the defendant.

1 4. Defendant incurred \$129.50 for the costs of the witness subpoenas and appearance fees at
2 trial for two witnesses, King County Correctional Officer Rita Moses and Nurse Susan
3 Densmore.

4 5. The document entitled Defendant's Cost Bill with this declaration contains an accurate
5 recitation of Defendant's recoverable costs in this matter.

6 I declare under penalty of perjury of the laws of the State of Washington and the United
7 States that the foregoing is true and correct.

8 DATED this 12th day of February, 2014.

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11 TOBIN E. DALE

DECLARATION OF SERVICE

I hereby certify that on this 12th day of February, 2014, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

Dwight Holland: dmanh3@comcast.net

/s/ Tobin E. Dale

TOBIN DALE, WSBA No. 29595

Assistant Attorney General

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